

### REMARKS

This Response is submitted in reply to the Non-Final Office Action dated February 19, 2010. Claims 1, 4, 7 to 24, 27, 30 to 32 and 34 to 41 are pending in this application. Claims 1, 4, 7 to 24, 27, 30 to 32, and 34 to 41 stand rejected. Claims 1, 17, 27, 31, 38, and 39 are in independent form. Claims 27 and 38 to 41 have been amended. No new matter has been introduced as a result of these amendments. Entry of the amendments and favorable reconsideration is respectfully requested. Please charge Deposit Account No. 02-1818 for all payments due in connection with this Response.

The Office Action rejected Claims 1, 4, 7 to 24, 27, 30 to 32, and 34 to 37 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,652,896 to Yamauchi et al. ("Yamauchi") in view of U.S. Patent No. 6,182,026 to Tillmann et al. ("Tillmann"). The Office Action rejected Claims 38 and 39 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,652,896 to Yamauchi in view of U.S. Patent No. 5,742,505 to Fushimoto et al. ("Fushimoto"). The Office Action rejected Claims 38 and 39 under 35 U.S.C. § 103(a) as being unpatentable over Yamauchi in view of Fushimoto, and further in view of U.S. Patent No. 5,541,837 to Fushimoto ("Fushimoto II"). Applicant respectfully disagrees with and traverses these rejections.

Regarding independent Claims 1 and 27, the Office Action admits that "Yamauchi does not explicitly disclose re-converting means for reconverting the confirmed at least one representation to a re-converted representation within the same first natural language by exchanging word order of the at least one representation." Office Action, page 7. The Office Action asserts that Tillmann teaches the re-converting means as claimed. Office Action, page 8. The Office Action similarly admits that Yamauchi is deficient and asserts Tillmann teaches the re-converting as claimed in independent Claims 17 and 31 on pages 14 to 15 of the Office Action. In responding to Applicant's previous arguments, the Examiner states "in an attempt to solidify and clarify the exact component of the "reconverting" limitation, the 35 USC 102 rejections of the above respective claims have been withdrawn, and upon further consideration, a new ground(s) of rejection is made in view of Tillman et al. (US 6,182,026), which explicitly teach "re-converting means for **reconverting the confirmed at least one representation to a re-converted representation within the same first natural language by exchanging word order of the at least one representation** for the exact purpose as taught by applicant, "Using

this information, we may reorder the input sentence such that its word order matches better the word order in the target language” (Tillman C.6 lines 15-18)”. Office Action, page 3 (emphasis in original). However, Applicant respectfully disagrees and traverses such rejections.

Applicant respectfully submits that Tillmann fails to disclose at least “re-converting the confirmed at least one representation to a re-converted representation within the same first natural language by exchanging word order of the at least one representation” as recited in independent Claim 1, and similarly recited in independent Claims 17, 27, and 31. Specifically, Tillmann discloses a general translation architecture based on Bayesian decision theory. Tillmann, abstract, col. 2, lines 49 to 50, Figure 1. The disclose translation method and architecture executes a global search to provide a result, which is used to generate the sequence of target words. Tillmann, col. 2, lines 49 to 67, Figure 1. The generated sequence of target words, or target language text, is provided as the output. Tillmann, col. 2, line 66 to col. 3, line 4. Moreover, the output is not a confirmed representation of the first natural language, but rather, is selected by the Bayesian decision theory. Accordingly, Tillmann fails to disclose, teach, or suggest “re-converting the confirmed at least one representation to a re-converted representation within the same first natural language by exchanging word order of the at least one representation” as recited in independent Claim 1, and similarly recited in independent Claims 17, 27, and 31.

Therefore, neither of Yamauchi nor Tillmann discloses, teaches, or suggests at least the claimed feature of “re-converting means for re-converting the confirmed at least one representation to a re-converted representation within the same first natural language by exchanging word order of the at least one representation” as recited in independent Claim 1, and similarly recited in independent Claims 17, 27, and 31. Therefore, it is respectfully submitted that independent Claims 1, 17, 27, and 31 are patentably distinguished from Yamauchi in view of Tillmann as asserted in the Office Action, and thus, are each currently in condition for allowance.

Regarding independent Claims 38 and 39, the Office Action states that “[t]he applicant does not claim a one-to-one correspondence between it’s source language and the second language . . .” Office Action, page 4. Applicant has clarified the scope of Claims 38 and 39 to address any confusion based on Applicant’s previous argument. Specifically, as amended, Claim 38 currently recites, in part, “converting means for converting the first natural language into a plurality of representations of a second natural language, wherein each of the plurality of

representations of the second natural language has a one-to-one correspondence with a representation of a third natural language; confirmation means for confirming one representation of the second natural language that is closest in meaning to the first natural language; processing means for translating the one representation of the second natural language to the third natural language;” and Claim 39 includes similar recitation.

Accordingly, Applicant respectfully submits that, at a minimum, the cited prior art, even if properly combinable, fails to teach “each of the plurality of representations of the second natural language has a one-to-one correspondence with a representation of a third natural language; confirmation means for confirming one representation of the second natural language that is closest in meaning to the first natural language; processing means for translating the one representation of the second natural language to the third natural language;” as claimed in Claims 38 and 39. The Examiner recognizes that Yamauchi fails to teach a one-to-one correspondence as claimed, and relies on Fushimoto’s French to English representations in Fig. 8 to cure the deficiencies of Yamauchi. Office Action, pages 21 to 22. Applicant respectfully submits that in view of the present amendments, that Fushimoto fails to cure the deficiencies of Yamauchi. Specifically, as argued previously, one French word corresponds to multiple English words. For example, the French word “trouver” corresponds to the English words “find,” “detect,” “deem,” “discover,” and “judge.” Fushimoto, Fig. 8. Similarly, the German word “finden” corresponds to the English words “find” and “discover;” and the English word “find” corresponds to the French words “trouver” and “estimer.” Fushimoto, Fig. 8. Therefore, it is respectfully submitted that independent Claims 38 and 39 are patentably distinguished from Yamauchi in view of Fushimoto as asserted in the Office Action, and thus, are each currently in condition for allowance.

Further, Applicant respectfully submits that each of dependent Claims 4, 7 to 16, 18 to 24, 30, 32, 34 to 37, 40, and 41 depend, directly or indirectly, from one of independent Claims 1, 17, 27, 31, 38, or 39, and are also allowable for the reasons given with respect to independent Claims 1, 17, 27, 31, 38, and 39, and further because of the additional features recited in these dependent claims. Accordingly, Applicant respectfully submits that all presently pending claims are patentably distinguished over the cited prior art.

An earnest endeavor has been made to place this application in condition for formal allowance, and such action is courteously solicited. If the Examiner has any questions regarding this Response, Applicant respectfully requests that the Examiner contact the undersigned.

The Commissioner is hereby authorized to charge deposit account 02-1818 for any fees which are due and owing.

Respectfully submitted,

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